

JAN 81

(C)

Loss of Income and BusinessA. Adverse Publicity1. Local Newspaper activity in cities where clients reside and lawsuits have been filed:

- a) Television appearances on newspapers and talk shows - (i.e. Boston news programs and morning talk show, Good Day)
- b) Newspaper commentary - local journalist have keyed upon criminal and tortious practices of Scientology members - (i.e. Boston Globe, Boston Herald, Real Paper, have published articles critical of Scientology practices as alleged in local complaints; Clearwater Sun, St. Petersburg Times, etc. have likewise exposed Scientology practices in outlined in local suits.)

2. National Media attention attributable to our office:

- a) UPI and AP wire services have written and transcribed numerous stories for their stories for their clients, Burden complaint and accusations re: L. Ron Hubbard; Dr. Lawrence Stifler and physical attack by Scientologist; LaVenda Van Schiack class action.
- b) 60 Minutes - our own office assisted Allan Maraynes in production of Scientology documentation by providing witnesses and documents.
- c) Time Magazine - our office provided extensive witnesses and documents to Evan Thomas.
- d) Prime Time - our office assisted Stephanie Neagher with documents and witnesses in preparation of documentary or Scientology.
- e) Reader's Digest - "Scientology: Anatomy of a Frightening Cult," assisted Gene Methvin with documents and witnesses.
- f) St. Louis Dispatch: assisting Bill Freivogel with facts supporting documents and witness corroboration.
- g) Las Vegas Review Journal - assisting Sherman Frederick with facts, supporting documents and witness corroboration.
- h) ABC San Francisco - We have assisted Tim Finely with facts supporting documents, and witness corroboration.
- i) Clearwater Sun - we have periodically assisted Richard Leiby with a series of articles regarding Scientology.
- j) National Enquirer - assisted N.E. reporter with background information for article about Presely estate.
- k) Shapping - Conway & Seigelman consulted extensively with us while writing their book. We provided them with particular documents.

- 1) Riverside Free Press - we assisted Dick Lynels with documents, witness, affidavits, and other background information regarding Scientology and the Gilman Hot Springs Operation.
- m) Los Angeles Times - we provided L.A. Times reporters with clients affidavits while they were preparing a series of articles on Scientology.
- n) The American Lawyer - did a report on Michael Flynn and the class action in Federal Court in Boston.
- o) Boston Globe - we assisted Paul Langer with witnesses, documents, and affidavits.

II. Future Adverse Publicity

A. Filing of future cases by city and state

1. "Turnkey" publicity

- a) press package including
 - prime documents
 - witness statements
 - previous news articles
 - previous media attention
- b) consultation with associate counsel re: effective handling of media and re Scientology tactics in harassment and intimidation of media.

B. Trial of future cases

- 1) public dissection of internal Scientology operation
- 2) media coverage of trial testimony and evidence:

- sales technique
- issue of auditing information
- criminal activities
- Guardians' activities
- financial policies, banking and transfer of funds
- disconnect and fair-games
- false scientific claims
- sexual misconduct
- R.P.F. and imprisonment
- military structure and discipline
- "sec checking" - E-meter as a lie detector
- OT 3 materials
- L. RON Hubbard personal history
- debt collection techniques
- Scientology use of burglary, electronic surveillance, third partying
- blown student doctrine

C. Judicial Precedents

- 1) news impact of judges decisions
 - a) Garrity
 - b) Kretzman
 - c) additional cases

2) professional publicity re claims filed and jury verdicts

D. March Conference (see separate section)

E. Book and Film Rights

F. Loss of Business to Scientology

1) increased rate of defection

- a) present members are influenced by continual onslaught of bad publicity and public exposure of Scientology "dirty laundry"
- b) potential defectors are influenced and encouraged by existence of organized group of ex-Scientologists who are suing Scientology
- c) potential defectors can easily locate and meet with organized ex-Scientologists and receive support from them.

2) new membership prospects are impaired by growing public awareness of vicious, greedy, criminal, fraudulent and conspiratorial aspects of Scientology, and by awareness of organized group of ex-Scientologists who are critical of Scientology.

Loss of Income and Business

I Diverse Publicity

-Local Newspaper Activity in cities where client and lawsuits are

- T.V. Appearances
- Radio Talk Show
- Newspaper Commentary

-National Media Attention

- UPI and AP Services
- 60 Minutes Assistance

Alan Karaynes

-Time Magazine

Evan Thomas

-Prime Time Show

Stephanie Meagher

-Readers Digest

Gene Rothwin

-St. Louis Dispatch

Bill Freivogel

-Las Vegas Review Journal

Sherman Frederick

-A.B.C. San Francisco

Tim Finley

-Riverside

Dick Lynes

-L.A. Times

Paul Kurtz

-The Zetetic

Paul Langer

-American Lawyer

Conway & Seigelman

-Boston Globe-Herald

Richard Leiby

-Snapping

-Clearwater Sun

-Canadian Newspaper

-National Enquirer

II Future Diverse Publicity

-Filing future cases by city and state

A. Turnkey Publicity

1. Press Package

- a. All Documents
- b. Witnesses
- c. Clients
- d. All other
- e. National
- f. media exposure

B. Trial of Future Cases-

A dissecting of internal Scientology practices.

1. Media Coverage of Trial Testimony and Evidence

- a. Sales Technique
- b. Recruiting
- c. G.O. Activities
- d. Misuses of Auditing Files
- e. Financial Policy
 - examination of management of transfer of funds between organization for jurisdictional purposes
- f. Scientology Policies

1. Disconnect

2. Fair Game

3. BL - Student

4. Hubbard Policy to Harass and Delay

- 5. Third Partying
- 6. Bail and Switch

C. Judicial President

Precedents

1. New contacts of Judges Decisions

- A. Judge Garrity
- B. Judge Krentzman

2. Professional Publicity

D. Future National Publicity

- Movie Rights
- Book Rights
- (see present adverse publicity)

E.

1. Local Media Coverage To be held in Clearwater (Seminar)

- 1. Clearwater Sun
- 2. St. Petersburg Times
- 3. T.V. Stations
- 4. Local Media Attending from other states

2. Professional Publication

- 1. Atla Magazine (American Trials Lawyers Association -(ed. note)
- 2. American Lawyer
- 3. etc.

3. National Media Attention

Loss of Icons

- A. Boston Org
- B. N.Y. Mission
- C. Las Vegas Org
- D. Las Vegas Mission Closed
- E. Flag at Clearwater